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20 United States of America

21 UNITED STATES DISTRICT COURT

22 FOR THE CENTRAL DISTRICT OF CALIFORNIA

23 UNITED STATES OF AMERICA,

24 Plaintiff,

25 v.

26 \$171,425.00 IN U.S. CURRENCY
27 and \$4,883.28 IN U.S. CURRENCY,

28 Defendants.

29 MICHAEL GALICIA,

30 Claimant.

) Case No.: CV 11-03205-MMM

) (JEMx)

) [proposed] CONSENT JUDGMENT OF
) FORFEITURE

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1 This action was filed on April 14, 2011. The government
2 represents that notice was given and published in accordance
3 with law. Claimant Michael Galicia ("Claimant") filed the only
4 claim to defendants \$171,425.00 in U.S. currency and \$4,883.28
5 in U.S. currency (collectively the "defendant funds") which were
6 seized on or about May 11, 2010, pursuant to federal seizure
7 warrants from Bank of America account numbers xxxxx-x4527 and
8 xxxxx-x4929, respectively, in the name of Michael Galicia. No
9 other statements of interest or answers have been filed, and the
10 time for filing such statements of interest and answers has
11 expired. Plaintiff and Claimant have reached an agreement that
12 is dispositive of the action. The parties hereby request that
13 the Court enter this Consent Judgment of Forfeiture.

14 **WHEREFORE, IT IS ORDERED, ADJUDGED AND DECREED:**

15 A. This Court has jurisdiction over this action pursuant
16 to 28 U.S.C. §§ 1345 and 1355 and over the parties hereto.

17 B. The Complaint for Forfeiture states a claim for relief
18 pursuant to 18 U.S.C. § 981(a)(1)(A) and (C).

19 C. Notice of this action has been given in accordance
20 with law. All potential claimants to the defendant funds other
21 than Claimant are deemed to have admitted the allegations of the
22 Complaint. The allegations set out in the Complaint are
23 sufficient to establish a basis for forfeiture.

24 D. The United States of America shall have judgment as to
25 \$126,308.28 of the defendant funds, together with all interest
26 earned by the government on \$126,308.28 of the defendant funds
27 since seizure, and no other person or entity shall have any
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1 right, title or interest therein.

2 E. \$50,000.00 of the defendant funds, together with all
3 interest earned by the government on that amount since seizure,
4 shall be paid to Claimant not later than sixty (60) days from
5 the date of entry of this judgment to by electronic transfer
6 directly into the account entitled "Egerman & Brown, LLP, Client
7 Trust Account." Claimant's counsel agrees to provide
8 appropriate financial institution account information within 10
9 days of execution of this consent judgment. Said payment shall
10 be subject to applicable federal law.

11 F. Claimant hereby releases the United States of America,
12 its agencies, agents, and officers, including employees and
13 agents of the United States Secret Service, from any and all
14 claims, actions or liabilities arising out of or related to this
15 action, including, without limitation, any claim for attorney's
16 fees, costs or interest which may be asserted on behalf of the
17 Claimant, whether pursuant to 28 U.S.C. § 2465 or otherwise.
18 Nothing in this proposed consent judgment is intended as, nor
19 should anything in this proposed consent judgment be interpreted
20 as an admission by claimant of any liability or wrongdoing.

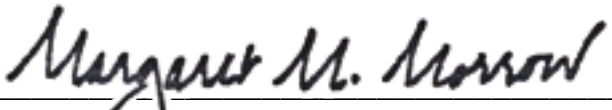
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1 G. The court finds that there was reasonable cause for
2 the seizure of the defendant funds and institution of these
3 proceedings. This judgment shall be construed as a certificate
4 of reasonable cause pursuant to 28 U.S.C. § 2465.

5 Dated: March 14, 2013

6 
7 THE HONORABLE MARGARET M. MORROW
8 UNITED STATES DISTRICT JUDGE

9 **Approved as to form and content:**

10 Dated: March 14, 2013

11 ANDRÉ BIROTTE JR.
12 United States Attorney
13 ROBERT E. DUGDALE
14 Assistant United States Attorney
15 Chief, Criminal Division
16 STEVEN R. WELK
17 Assistant United States Attorney
18 Chief, Asset Forfeiture Section

16 /s/ _____
17 JENNIFER M. RESNIK
18 Assistant United States Attorney
19 Asset Forfeiture Section

19 Attorneys for Plaintiff
20 United States of America

21 DATED: March 14, 2013

22 EGERMAN & BROWN, LLP

23 /s/ _____
24 LEE EGERMAN
25 Attorney for Claimant
26 Michael Galicia
27
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